

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

V.

DOCKET NO. 12-CR-00167-SM

QUENTIN SIMON

Defendant

ASSENTED TO MOTION TO CONTINUE

NOW COMES the defendant, Quentin Simon, by and through counsel, and hereby move this Court to continue his January 14, 2014 Sentencing Hearing to January 31, 2014 at 10:30 a.m..

In support of this Motion, the defendant states as follows:

1. The defendant is scheduled to appear in this Court for his Sentencing Hearing on January 14, 2014 at 2:00 p.m.
2. The undersigned counsel has a previously scheduled Trial at the 3rd Circuit/District Division/Conway, State v. Fiola, and a Probable Cause Hearing scheduled at the 10th Circuit/District Division/Portsmouth, State v. Pontbriand, on January 14, 2014;
3. The undersigned counsel is in the process of obtaining character letters in support of client. The most recent letter from the defendant's Godfather was obtained on January 6, 2014 and the undersigned counsel is awaiting letters from the defendant's employer, his oldest daughter's mother (who resides in the Bronx, New York, and is expected to address in her letter her desire to have the defendant's daughter, who is eight years old and having difficulties with her living environment, to move from the Bronx to the defendant's residence in Manchester, New Hampshire) and other individuals.

4. The client is also in the process of completing his fire technician's certification for his employment.
5. In addition, the undersigned counsel has prepaid vacation plans out of the State of New Hampshire from January 16, through January 21, 2014 and from February 21, through March 2, 2014.
6. The defendant is aware of this motion.
7. That the U.S. Attorney's Office has no objection to this Motion to Continue.

WHEREFORE, the defendant respectfully requests that this Court grant this Assented to Motion to Continue and reschedule the Sentencing Hearing to January 31, 2014.

Respectfully submitted,
Quentin Simon,
By his Attorney,

DATE: January 8, 2014

/S/ Paul J. Garrity
Paul J. Garrity
Bar No. 905
14 Londonderry Road
Londonderry, NH 03053
603-434-4106

CERTIFICATE OF SERVICE

I, Paul J. Garrity, herein certify that on this 8th day of January, 2014, a copy of the within Assented to Motion to Continue Sentencing was e-filed to the U.S. Attorney Office and to all parties of record.

/S/ Paul J. Garrity
Paul J. Garrity